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December 17, 2021

**VIA ELECTRONIC CASE FILING**

The Honorable Loretta A. Preska  
United States District Judge  
500 Pearl Street  
New York, NY 10007

**Re: *Amy Miller v. Levi & Korsinsky, LLP, et al.*  
Docket No.: 20-cv-01390(LAP)(BCM)**

Dear Judge Preska:

We represent Plaintiff Amy Miller in this employment case against Defendants Levi & Korsinsky, LLP, Eduard Korsinsky and Joseph Levi. We write to respectfully request an extension of Plaintiff's deadline to produce ESI and documents other than those produced as ESI production from the current deadline of December 17 to Wednesday, December 22, 2021 and a mutual extension of Defendants' production of discovery responses to requests for compensation information from December 17 to December 22, 2021. (Dkt. # 50, Order endorsing first request to extend, dated Dec. 6, 2021.) This is Plaintiff's second request to extend her ESI production deadline.

Defendants agree to a mutual extension of time to December 22, 2021 of the following deadlines set forth in the December 3 letter that was "so ordered" by the Court on December 6 (*Id.*):

1. Plaintiff is to complete her ESI production by December 22, 2021, and Plaintiff's production of documents other than those produced as ESI production, initially stated in Plaintiff's Responses and Objections to Defendants' First Request for the Production of Documents to be produced within 30 days of October 28, 2021, is now to be completed promptly but not later than December 22, 2021.
2. Defendants will produce discovery responses to compensation information sought in Plaintiff's First Set of Interrogatories and Plaintiff's First Request for Production of Documents by December 22, 2021.

Plaintiff requests this brief extension because of the large production that is being prepared with thousands of documents from Plaintiff's personal email account and text messages and issues

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that have arisen with finalizing the production through our ESI vendor.

We thank the Court for its consideration of this request.

Respectfully Submitted,

*/s/ Samuel O. Maduegbuna*

Samuel O. Maduegbuna

cc: Allen B. Roberts, Esq.  
Lori A. Medley, Esq.

*Attorneys for Defendants*